

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

Plaintiff,

v.

BRYANSTON GROUP INC. et al.,

Defendants.

X

Case No.: 1:08-cv-04806 (LAP)

**MOTION TO ADMIT PAUL  
MOGIN PRO HAC VICE**

X

Pursuant to Local Civil Rule 1.3(c), undersigned counsel respectfully moves for the admission *pro hac vice* of the following attorney in the above-captioned matter:

**Paul Mogin**  
Williams & Connolly LLP  
725 Twelfth Street, N.W.  
Washington, DC 20005  
Tel: (202) 434-5000  
Fax: (202) 434-5029

Mr. Mogin is a member in good standing of the Bar of the District of Columbia. There are no pending disciplinary proceedings against Mr. Mogin in any State or Federal Court. This Motion is based on the accompanying Affidavit of Stuart E. Abrams and a Certificate of Good Standing from the District of Columbia Bar. A proposed Order is attached hereto.

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OK

Dated: July 25, 2008

FRANKEL & ABRAMS

By: 

Stuart E. Abrams

Frankel & Abrams

230 Park Avenue, Suite 660

New York, New York 10169-0005

(212)661-5000

*Counsel for Claimant Beatrice Tollman*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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X

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRYANSTON GROUP INC. et al.,

Defendants.

Case No.: 1:08-cv-04806 (LAP)

**DECLARATION OF STUART E.  
ABRAMS IN SUPPORT OF  
MOTION TO ADMIT PAUL  
MOGIN PRO HAC VICE**

X

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I, STUART E. ABRAMS, ESQ., an attorney duly admitted to practice law before the Courts of the State of New York, hereby declare the following to be true under the penalties of perjury, pursuant to 28 U.S.C. § 1746:

1. I am a partner at Frankel & Abrams and counsel for claimant Beatrice Tollman in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth here and in support of the motion to admit Paul Mogin as counsel pro hac vice to represent Ms. Tollman in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice in 1978. I am also a member in good standing of the bar of this Court, admitted in 1978.
3. I have known Mr. Mogin since earlier this year.
4. Mr. Mogin is a partner at Williams & Connolly, in Washington, DC.

5. I have found Mr. Mogin to be a skilled attorney and person of the highest integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

6. Mr. Mogin is a member in good standing of the bar of the District of Columbia. In connection with this motion, I am submitting a Certificate of Good Standing issued by this bar. I am aware of no pending disciplinary proceedings against Mr. Mogin in any state or federal court.

7. For the foregoing reasons, I respectfully move the *pro hac vice* admission of Paul Mogin in the above-captioned matter. For the Court's convenience, a proposed order granting this motion is attached hereto.

Dated: July 25, 2008

FRANKEL & ABRAMS

By: 

Stuart E. Abrams  
Frankel & Abrams  
230 Park Avenue, Suite 660  
New York, New York 10169-0005  
(212)661-5000

*Counsel for Claimant Beatrice Tollman*



District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D. C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

PAUL MOGIN

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was on the 18<sup>TH</sup> day of DECEMBER, 1981

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on July 23, 2008.

GARLAND PINKSTON, JR., CLERK

By: *M. Charles*  
Deputy Clerk

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

X

UNITED STATES OF AMERICA,

Plaintiff,

V.

BRYANSTON GROUP INC. et al.,

Defendants.

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Case No.: 1:08-cv-04806 (LAP)

**[PROPOSED] ORDER FOR  
ADMISSION OF PAUL MOGIN  
PRO HAC VICE**

X

This matter having been brought before the Court by motion pursuant to Local Civil Rule 1.3(c) for the admission *pro hac vice* of Paul Mogin, Esq., in the above-captioned matter, it is this \_\_\_\_\_ day of \_\_\_\_\_ 2008, hereby

ORDERED that the motion is GRANTED, and

IT IS FURTHER ORDERED THAT Paul Mogin shall be admitted *pro hac vice* in the above-captioned matter. Counsel shall remit the required \$25 fee to the Cashier's Office for this *pro hac vice* admission.

Dated:

HON. LORETTA A. PRESKA, U.S.D.J.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,  
Plaintiff,

v.

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Defendants.

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**CERTIFICATE OF SERVICE**

STUART E. ABRAMS, hereby certifies that on July 28, 2008, I caused to be served by First Class Mail a true and correct copy of the attached Motion for Admission Pro Hac Vice and supporting papers upon


Barbara Ann Ward  
U.S. Attorney's Office, SDNY  
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K. Chris Todd, Esq.  
Kellogg, Huber, Hansen, Todd,  
Evans & Figel, P.L.L.C.  
1615 M St. NW, Suite 400  
Washington, D.C. 20036

Dated: July 28, 2008

By:   
Stuart E. Abrams  
Counsel for Stanley Tollman